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ATTORNEYS FOR DEBTOR(S)

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

| | | |
|-------------------------|---|------------------------------|
| IN RE: | § | |
| | § | Case No.: 24-43061-MXM-13 |
| MARCOS J ULIBARRI | § | |
| | § | Chapter: 13 |
| Debtor(s) | § | |
| <hr/> | | |
| OWINGS AUTO CENTER, LLC | § | |
| Movant, | § | |
| | § | |
| vs. | § | Hearing Date: MARCH 13, 2025 |
| MARCOS J ULIBARRI | § | Hearing Time: 9:30 AM |
| | § | |
| Respondent(s) | § | |

DEBTOR'S RESPONSE TO MOTION FOR RELIEF FROM STAY
FILED BY Owings Auto Center, LLC

TO THE HONORABLE JUDGE OF THIS COURT:

COMES NOW **Marcos J. Ulibarri**, Debtor(s) in the above-styled and numbered case, and in response to the Motion for Relief from Stay of **Owings Auto Center, LLC**, ("Movant") in regards to the collateral referenced in Movant's Motion.

Debtor respectfully shows:

SPECIFIC ADMISSIONS

1. Debtor admits the allegations contained in paragraph(s) **1, 3, and 5** of Movant's Motion.

SPECIFIC DENIALS

2. Debtor denies the allegations contained in paragraph(s) **7, 8, 10, 11 and 12** of Movant's Motion.

EFFECT OF QUALIFIED DENIAL OR LACK OF ADMISSION

3. Debtor neither admits nor denies the allegations contained in paragraph(s) **2, 4, 6 and 11** of Movant's Motion having insufficient knowledge or information to do so, and therefore, makes a qualified denial of the allegations demanding strict proof thereof.

ELEMENT OF DEBTOR'S DEFENSE

4. There exists cause justifying the denial of the Movant's Motion and requested action for the following reasons:

- a. The property is necessary for the effective reorganization of the Debtor because it is the Debtor's Vehicle.
 - i. Debtor would show the Court that any default may be cured within a reasonable time by payment.
 - ii. Debtor is prepared to make payment of \$500.00 for Arrears on March 6, 2025.
 - iii. Debtor is prepared to cure the remaining delinquency in full within 3 months.

RIGHT TO AMEND OR SUPPLEMENT RESERVED

5. Debtor reserves the right to amend or supplement this Answer with additional information supported by Debtor's evidence, affidavit and/or amended answer.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Debtor prays that a hearing be set in the

instant matter, that Movant's Motion be denied in all respects and that the automatic stay pursuant to §362 of the United States Bankruptcy Code remain in full force and effect, and for such other and further relief to which the Debtor may show themselves entitled.

Dated: March 7, 2025

Respectfully submitted,

By: /s/ Troy Trovato
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 7, 2025, a true and correct copy of the foregoing Response to Motion For Relief From Stay was served on the following parties in interest by first class mail or electronic notice:

CHAPTER 13 TRUSTEE

Tim Truman
6851 N.E. Loop 820, Suite 300
N. Richland Hills, TX 76180

U.S. TRUSTEE

Office of the United States Trustee
1100 Commerce, Room 976
Dallas, TX 75242

DEBTOR

Marcos Jesse Ulibarri
5429 Parker Henderson Rd. Lot M44
Fort Worth, TX 76119

OPPOSING COUNSEL

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